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Attorneys for Defendants
LARRY HSU, ARTHUR A. KOCH, BRYAN M.
REASONS, ROBERT L. BURR, LESLIE Z.
BENET, ALLEN CHAO, NIGEL TEN FLEMING,
MICHAEL MARKBREITER and PETER R.
TERRERI

and

Nominal Defendant IMPAX LABORATORIES, INC

[Additional Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NICHOLAS KARANT, Derivatively on
Behalf of Nominal Defendant IMPAX
LABORATORIES, INC.

Plaintiff,

vs.

LARRY HSU, ARTHUR A. KOCH, BRYAN
M. REASONS, ROBERT L. BURR, LESLIE
Z. BENET, ALLEN CHAO, NIGEL TEN
FLEMING, MICHAEL MARKBREITER
and PETER R. TERRERI

Defendants.

IMPAX LABORATORIES, INC.,

Nominal Defendant.

CASE NO. 14-cv-04313-SI

**STIPULATION AND ~~PROPOSED~~ ORDER
CONTINUING INITIAL DISCLOSURES
PENDING THE COURT'S ORDER ON THE
PENDING MOTIONS TO DISMISS**

Date:

Time:

Location: Courtroom 10

Judge: Honorable Susan Ilston

WHEREAS, on September 24, 2014, Plaintiff Nicholas Karant ("Plaintiff") filed the above captioned shareholder derivative action (the "Action") on behalf of Nominal Defendant Impax Laboratories, Inc. ("Impax" or the "Company") against Individual Defendants Larry Hsu, Arthur A. Koch, Bryan M. Reasons, Robert L. Burr, Leslie Z. Benet, Allen Chao, Nigel Ten Fleming, Michael Markbreiter, and Peter R. Terreri (the "Individual Defendants");

WHEREAS, on December 15, 2014, Impax and the Individual Defendants filed their respective Motions to Dismiss the Complaint (Dkt. Nos. 25, 26);

WHEREAS, on January 9, 2015, Plaintiff's and Defendants' (the "Parties") Initial Disclosures are due;

WHEREAS, on March 13, 2015, the Court is to hear oral argument on the Motions to Dismiss;

WHEREAS, for the sake of efficiency and mindful of the Court's and Parties' resources, the Parties have agreed to continue the Parties' Initial Disclosures until after the Court has ruled on Defendants' Motions to Dismiss.

Accordingly, it is hereby stipulated between the Parties, as follows:

1. The Parties shall file their respective initial disclosures no later than 30 days following the Court's ruling on the Motions to Dismiss.

IT IS SO STIPULATED.

DATED: January 6, 2015

THE WEISER LAW FIRM, P.C.

LATHAM & WATKINS LLP

By: /s/ Kathleen A. Herkenhoff
Kathleen A. Herkenhoff

By: /s/ Peter A. Wald
Peter A. Wald

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Attorneys for Defendants Larry Hsu, Arthur A. Koch, Bryan M. Reasons, Robert L. Burr, Leslie Z. Benet, Allen Chao, Nigel Ten Fleming, Michael Markbreiter, Peter R. Tereri and Nominal Defendant Impax Laboratories, Inc.

ORDER

Pursuant to Stipulation, IT IS SO ORDERED.

DATED: 1/8/14



HON. SUSAN ILLSTON

SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing Stipulation and [Proposed] Order Continuing Initial Disclosures Pending the Court's Order on the Pending Motions to Dismiss. Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I, Peter A. Wald, attest that concurrence in the filing of this document has been obtained.

DATED: January 6, 2015

/s/ Peter A. Wald
Peter A. Wald